

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
MIDLAND/ODESSA DIVISION**

CONTIQUE WILLCOT,

Plaintiff,

VS.

SECURITIES & EXCHANGE
COMMISSION, GTS SECURITIES LLC,
ARI RUBINSTEIN, NEXT BRIDGE
HYDROCARBONS, INC., JOHN BRDA,
GREGORY MCCABE, FINANCIAL
INDUSTRY REGULATORY AUTHORITY,

Defendants.

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Case No. 7:24-CV-317-DC-RCG

DEFENDANT BRDA'S UNOPPOSED MOTION TO EXTEND PLEADING DEADLINE

Defendant John Brda files this unopposed motion seeking an extension of his deadline to answer or otherwise respond to Plaintiff's Amended Complaint (Doc. 3) and respectfully shows the Court as follows:

1. Plaintiff filed a Complaint on December 6, 2024 (Doc. 1), and an Amended Complaint on December 30, 2024. (Doc. 3)
2. The Amended Complaint spans nearly 80 pages and 285 paragraphs, against at least 7 defendants, and at least 8 causes of action. (*See id.*)
3. On December 30, 2025, Plaintiff requested an issuance for summons (Doc. 4), which was issued later that same day. (Doc. 5)
4. On March 6, 2025, Mr. Brda was served with the Amended Complaint and his deadline to answer or otherwise respond to the Amended Complaint is currently March 27, 2025.

5. Undersigned counsel is aware of at least three other matters pending before the Court where no responsive pleadings have been filed, with common parties, and common questions of law and fact, which include the following:

- *Pease v. SEC, et al.*, No. 7:24-cv-322 (W.D. Tex. Dec. 6, 2024);
- *Spears v. Next Bridge Hydrocarbons Inc., et al.*, No. 7:24-cv-321 (W.D. Tex. Dec. 6, 2024); and
- *Vetrano v. Brda, et al.*, No. 7:24-cv-325 (W.D. Tex. Dec. 9, 2024).

6. Good cause for this extension is made because it would assist in the efficient presentation to the Court of Mr. Brda's defenses and promote judicial economy.

7. The Court granted a similar extension in *Vetrano* and *Spears* on March 17, 2025 and March 19, 2025, respectively, extending Mr. Brda's responsive pleading deadline in those matters to June 16, 2025.

8. Accordingly, Mr. Brda respectfully requests that the Court extend his deadline to answer or otherwise respond to Plaintiff's Amended Complaint to June 16, 2025.

9. This is Mr. Brda's first request for an extension of time.

10. This extension is not sought for purposes of delay, but so that justice may be done.

11. Undersigned counsel conferred with *pro se* Plaintiff; Plaintiff indicated he is unopposed to the requested extension.

[signature page follows]

Dated: March 21, 2025.

Respectfully submitted,

/s/ Jason S. Lewis

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ATTORNEYS FOR DEFENDANT JOHN BRDA

CERTIFICATE OF CONFERENCE

Pursuant to the Local Civil Rule CV-7(G), the undersigned hereby certifies that, as counsel for Defendant Brda, he conferred with Plaintiff Contique Willcot via telephone and email. Plaintiff has indicated that he is not opposed to the relief requested by this motion.

/s/ Ryan D. Lantry
Ryan D. Lantry

CERTIFICATE OF SERVICE

I certify that I served the foregoing document on all counsel of record via the Court's CM/ECF system on March 21, 2025.

/s/ Jason S. Lewis
Jason S. Lewis